

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

Chervon (HK) Limited, Chervon North America, Inc.,

Plaintiffs,

v.

One World Technologies, Inc., Techtronic Industries Co. Ltd., Homelite Consumer Products, Inc.,

Defendants.

C.A. No. 19-1293-LPS-SRF

**PLAINTIFFS' MOTION TO STRIKE DEFENDANTS' NEW INVALIDITY THEORIES  
THAT WERE NOT DISCLOSED AND CHARTED IN DEFENDANTS'  
FINAL INVALIDITY CONTENTIONS**

Plaintiffs Chervon (HK) Limited and Chervon North America, Inc. (collectively, "Chervon") hereby move to strike all of Defendants' new prior art §§ 102 and 103 invalidity theories that were not disclosed and charted in Defendants' Final Invalidity Contentions. The grounds for this Motion are set forth fully in the Opening Letter submitted concurrently herewith.

Pursuant to D. Del. LR 7.1.1, undersigned counsel hereby avers that a reasonable effort was made to reach agreement with opposing counsel regarding the subject matter of this Motion, including oral communication involving Delaware counsel, but no agreement was reached.

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